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Hickman's Egg Ranch, Inc
February 6, 2017 Update

Background

Hickman's Egg Ranch operates multiple chicken egg farms in the state of Arizona. Each facility generally consists of multiple barns, boiler and diesel engines, and certain other industrial equipment. Hickman's operations have attracted the attention of multiple local and national environmental groups, who have submitted a series of complaints and legal challenges to both us and Maricopa County.

Tonopah, AZ facility

Originally constructed in 2014, the Tonopah facility is located in western Maricopa County, outside of the PM2.5 nonattainment area. The facility operates with a non-title V permit issued by Maricopa AQD that authorizes several diesel engines and natural gas fired boilers, but does not include any of the chicken barns or manure storage and handling, which are considered agricultural practices.

Arlington, AZ facility

Originally constructed in 1998 (north) and expanded in 2008 (south), the Arlington facility is also located in western Maricopa County, outside of the PM2.5 nonattainment area, approximately 16 miles from the Tonopah facility. Chicken capacity at the Arlington facility has expanded multiple times since original construction, consisting of both older and newer chicken barn designs. Arlington also operates with a non-title V permit issued by Maricopa AQD that includes diesel engines, a propane dryer, and natural gas fired boilers, but does not include any agricultural practices. Agricultural practices at Arlington consist of manure storage and handling, as well as a manure processing/pelletization operation, as Arlington also receives the chicken manure from the Tonopah facility.

Ak Chin facility

Hickman's also operates a facility located on Ak-Chin tribal land, near the town of Maricopa, AZ, in Pinal County. Limited information is available for this facility. It was originally constructed in 2002, and cursory discussions with Ak Chin environmental staff suggest that it has expanded recently. Aerial photographs indicate the Ak Chin facility is approximately half the size of Tonopah.

Ongoing Issues

Arlington and Tonopah chemical releases

- On February 2, 2017, Steve Brittle (Don't Waste Arizona [DWAZ]) submitted an email to

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the Acting RA, asserting that the ammonia emissions from Hickman's facilities qualified as an accidental release. CERCLA lists a reportable quantity (RQ) threshold of 100 lbs for ammonia and for hydrogen sulfide. EPCRA also lists an extremely hazardous substance (EHS) RQ of 100 lbs for hydrogen sulfide.

- DWAZ's assertion is based in part of an ADEQ modeling analysis of ammonia and hydrogen sulfide ambient impacts. ADEQ estimated ammonia emission rates of approximately 2,000 lbs/day (Tonopah) and 3,600 lbs/day (Arlington) using the Indiana study emission factors.

Tonopah facility permit remand

- A 2015 minor revision (for the addition diesel emergency generators) was appealed before the Maricopa County Air Pollution Hearing Board, which remanded the permit to Maricopa AQD.
- On December 2, 2016, the board ordered Maricopa AQD to, among other things, apportion/determine emissions as fugitive or non-fugitive and render a decision on whether Hickman's Egg Ranch is or is not a major source.

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- A Hickman's facility in San Joaquin Valley operates with a title V permit, and includes chicken barn equipment as permitted sources.

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- In a recent conference call, Maricopa indicated that they intended to move forward with a determination that emissions from the chicken barns are fugitive in nature. As a result, they will not be quantifying emissions. Public notice of the draft permit is expected by the end of Feb/early March. They are willing to provide a pre-draft version to us prior to public notice.

Ak-Chin facility

- We have no record of facility registration with EPA. Have not consulted with Pinal County APCD regarding this issue.
- Chicken head count is unknown. Presence of other industrial equipment (engine, boiler) is likely, but unknown.
- Ak Chin environmental staff has very limited knowledge of the facility, but did indicate that they thought manure was being land applied and not transported to Arlington.
- Based on aerial photographs, two of the 7 chicken barns appear to be of the newer barn design.